

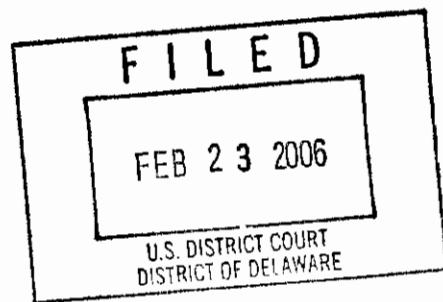
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

To Warden Patrick

Ryan, Warden of the
Delores J. Baylor Wom-
en's Correctional Inst-
itution at 660 Baylor Blvd.
NEW CASTLE DE. 19720.

Regarding, and in the
interest of Terri Lee
MEYER, inmate no. 0031169
at B.W.C.I. Same address
as above.

06-117



HABEUS CORPUS

Warden Ryan, you are directed ~~to~~
under federal law, to transfer inmate Terri Lee
MEYER to the United States District Court, District
of Delaware at the Caleb Boggs Federal Building,
844 N. King Street, within the next days regard-
ing the unconstitutional and illegal transfer of
the inmate. Grounds are as set forth:

On 1-26-06 Inmate MEYER was illegally transferred from Unit 3- minimum SECURITY "Honor Pod" by Warden Ryan, Colleen Shotzberger, and Dr. Jacob MN, working in concert with one another. Inmate MEYER was placed in Unit 6- Mental health unit, and taken from her job as Law Clerk (stripped of personal property without notice, a hearing, or due process of law). MEYER was not given an opportunity to present her views on the matter, and they had no rational reason. SEE Vitek v. Jones 445 U.S. 480, 493 (1980) SEE also Hatch vs. the District of Columbia 184 F.3d 846 847 (D.C. Cir. 1999)

The deprivations give rise to a liberty interest, and the action taken against MEYER violated her rights under the 1st, 4th, 5th, and 8th Amendments of the U.S. Constitution.

The transfer has caused a significant hardship on MEYER, because she is currently locked in a double bunked cell with a room mate who is unstable and has robbed her. MEYER is now locked in her cell most of the time and other than meals she cannot leave the unit.

Ryan, Shotzbergers, and Dr. Jacob, orchestrated the deprivations, and transfer, when they discovered that MEYER was drafting a lawsuit (1983) against them, and Correctional Medical Services for numerous violations.

The 1st Amendment prohibits jail and prison officials from retaliating against inmates who report complaints, file grievances, or file law suits. SEE Bobcock v. White 162 F.3d 267 275 (7th Cir 1996), in addition prison officials are not permitted to interfere with the inmates, or deprive them for redressing the court.

Jail officials must comply with their own mandatory regulations, and notice of the deprivation. SEE Wolf vs. McDonnell 418 U.S. 539 558 (1974).

Therefore, Terri Lee Meyer respectfully asks the Court to protect her constitutional rights by ordering Warden Patrick Ryan to transfer her immediately back to Unit 3- "Honor Pod" to the room in which she was taken from; return all of her personal property to her room (from booking); and refrain from retaliation, harassment, interfering with her access and address to the court, or any other violation of the U.S. Constitution, unless he can prove a penalological interest that outweighs Inmate Meyer's rights. Or, immediately modify her sentence to Plummer Center Work Release.

Respectfully Submitted
Terri Lee Meyer

2-3-06